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Department of the Air Force 96 CES/DEEV (Lt. Gastler, 64316) #Dyess Air Force Base, Texas 79607

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Dear Lt. Gastler:

The EPA has reviewed the workplan for the RI/FS at Dyess AFB. We offer the following comments:

Part 1: Remedial Investigation Sampling Plan

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1.3.2.1 (Second Paragraph) p.1-10

"A buried railroad tank car, with a capacity of 10,000 gallons has been used as a major storage facility...Waste placed in the tank car by shop personnel included such items as carbon removing compounds, hydraulic fluids, penetrant oils, thinners, paints, and solvents." The third paragraph indicates that the tank is scheduled to be removed prior to the remedial investigation and that tank bottoms have not been tested or removed. It is recommended that the tank bottoms of the tank car are analyzed using the Toxicity Characteristic Leaching Procedure (TCLP).

1.3.4 Hydrology p.1-25

The Dyess AFB and Gravel Isopach Map does not have enough data points to make a thickness determination. At point 4.5, the isopach lines are incorrectly drawn.

2.3.3 Monitoring Well Installation and Development p.1-33

Tentatively, eight groundwater monitoring wells are proposed for Site I Landfill which may be adequate to determine for groundwater flow direction and gradient. However, no wells have been located to the west of the landfill, which is at the boundary of the installation. At least two wells should be located on the western side of the landfill to assess the potential for off-site groundwater contamination.

Part II. Quality Assurance/Quality Control (QA/QC) Plan-

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Table 2.3 Specification for Field QA/QC Samples p.2-12

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6H-EC FREY Field (trip) blank and equipment blank samples will be used for five percent of all samples. We recommend (per the RCRA Technical Enforcement Guidance Document Guidelines) that both field (trip) blank and equipment blank samples have a frequency use of ten percent for all samples.

If you have any questions about our review, please contact John Meyer at (214) 655-6730.

Sincerely,

Robert E. Hannessch Robert Hannesschlager
Chief
Superfund Enforcement Branch